

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
WACO DIVISION

JON BATTS,

*Plaintiff,*

v.

REMINGTON ARMS COMPANY, LLC,

*Defendant.*

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CIVIL ACTION NO. 6:17-cv-00346  
[JURY DEMANDED]

**STIPULATION REGARDING DEFENDANT REMINGTON ARMS COMPANY, LLC'S  
MOTION TO DISMISS AND FOR SANCTIONS AGAINST PLAINTIFF JON BATTS**

Plaintiff Jon Batts and Defendant Remington Arms Company, LLC hereby stipulate as follows:

1. Remington's Motion to Dismiss and for Sanctions (ECF No. 31) is well-taken and has merit;
2. Plaintiff Jon Batts agrees with the aforementioned motion;
3. Plaintiff Jon Batts agrees that the aforementioned motion should be granted for all the reasons stated therein;
4. Plaintiff Jon Batts agrees that this action be dismissed with prejudice, subject to the terms of this stipulation and terms the Court may set; and
5. Plaintiff Jon Batts shall reimburse Remington in the amount of fifteen thousand dollars (\$15,000) for costs incurred in this matter for payments to its experts for efforts to recover deleted video evidence. The reimbursement shall be paid in three equal annual payments of five thousand dollars (\$5000) with the first payment due on January 15, 2020, the second payment due on December 1, 2020, and the third payment due on December 1, 2021. The payments shall be

payable to Remington Arms Company, LLC and shall be delivered to Steven E. Danekas, Swanson, Martin & Bell, LLP, Suite 3300, 330 North Wabash, Chicago, IL 60611.

Dated: November 15, 2019

Respectfully submitted,

By: /s/ Bryan L. Sample

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**ATTORNEYS FOR PLAINTIFF**  
**JON BATTS**

By: /s/ Steven E. Danekas

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**ATTORNEYS FOR DEFENDANT**  
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